

# EXHIBIT F

Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis

v.

Key Commercial Finance, et al.,

No. 1:18-cv-01516

**Proposed Trial Exhibits of Plaintiff Deborah S. Skeans as Executrix for the Estate of Frank E. Pavlis**

<b>Trial Exhibit Number</b>	<b>Bates Number and/or Deposition Exhibit Number</b>	<b>Description</b>	<b>Defendants' Objection</b>	<b>Plaintiff's Response</b>
PTX1	P-001922	September 17-19, 2017 email chain between D. Skeans and C. Harris re: "Frank Pavlis."	Hearsay	Admissible under Rule 803 as it speaks to Ms. Skeans' then-existing state of mind and mental impressions.
PTX2	P-001923	September 19, 2017 email from D. Bivens to D. Skeans re: "Got your delivery."	Hearsay	Admissible under Rule 801(2)(C) and (D); Admissible under Rule 803 as it speaks to Ms. Skeans then-existing state of mind and mental impressions.
PTX3	P-001924	September 20, 2017 email from D. Skeans to J. Billingsley, cc'ing Darbin Skeans, re: "Pavlis".	Hearsay, Prejudice	Admissible under Rule 803 as it speaks to Ms. Skeans' and Mr. Billingsley's then-existing state of mind and mental impressions; alternatively, admissible as a document not offered for the truth of the matter asserted but rather of non-hearsay evidence of Mr. Billingsley's state of mind, motive and/or intent. The probative value of this document outweighs any alleged prejudice.

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PTX4	P-000091-99	September 20, 2017 letter from E. Lentz to H. Goldman with attachment.	Hearsay	Admissible under Rule 803 as it speaks to Ms. Skeans' and Mr. Lentz's then-existing state of mind and mental impressions.
PTX5	P-001945-1946	September 21, 2017 email chain between D. Bivens and D. Skeans re: "Billingsley Post-Hearing Brief."	Hearsay	Admissible under Rule 801(2)(C) and (D); Admissible under Rule 803 as it speaks to Ms. Skeans' then-existing state of mind and mental impressions. The probative value of this document outweighs any alleged prejudice.
PTX6	P-001944	September 21, 2017 email from D. Skeans to E. Lentz re: "Pavlis."	Hearsay, Prejudice	Admissible under Rule 803 as it speaks to Ms. Skeans' and Mr. Lentz's then-existing state of mind and mental impressions. The probative value of this document outweighs any alleged prejudice.
PTX7	P-002138	December 7, 2017 email from D. Skeans to S. Mucciarone, cc'ing Ed Lentz, re: Frank Pavlis".	Relevance, Hearsay, Prejudice	Admissible under Rule 803 as it speaks to Ms. Skeans', Ms. Muccisrone's, and Mr. Lentz's then-existing state of mind and mental impressions. The probative value of this document outweighs any alleged prejudice.

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PTX8	P-000160-168/P143	December 14, 2017 Arizona Republic Article	Relevance, Prejudice	Admissible under Rule 803 as it speaks to Ms. Skeans' then-existing state of mind and mental impressions; Admissible under Rule 801(2)(A). The probative value of this document outweighs any alleged prejudice.
PTX9	P-002038	December 15, 2017 email from D. Skeans to D. Bivens re: "Billingsley."	Relevance, Prejudice	Admissible under Rule 801(2)(C) and (D); Admissible under Rule 803 as it speaks to Ms. Skeans' then-existing state of mind and mental impressions. The probative value of this document outweighs any alleged prejudice.
PTX10	P-002129-2137	January 3, 2018 email from D. Skeans to J. Billingsley re: "Mobile.Co." and attachment.	Relevance, Hearsay, Prejudice	Admissible under Rule 803 as it speaks to Ms. Skeans' and Mr. Billingsley's then-existing state of mind and mental impressions; alternatively, admissible as a document not offered for the truth of the matter asserted but rather of non-hearsay evidence of Mr. Billingsley's state of mind, motive, and/or intent. The probative value of this document outweighs any alleged prejudice.

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PTX11	P-003249	May 1, 2018 email from D. Bivens to W. Mahoney re: "Justin Billingsley continues his willingness to provide you information."	Hearsay	Admissible under Rule 801(2)(C) and (D)
PTX12	KCF009280-9292/P87	June 19, 2018 email from A. Dean to J. Billingsley re "Follow Up - Subscription Agreement," with attachment.	Hearsay	Admissible under Rule 803 as it speaks to Mr. Billingsley's then-existing state of mind and mental impressions; alternatively, admissible as a document not offered for the truth of the matter asserted but rather of non-hearsay evidence of Mr. Billingsley's state of mind, motive, and/or intent.
PTX13		Defendants' March 26, 2020 Privilege Log	Privilege Log is not an Exhibit	Privilege Log is admissible under Rule 801(d)(1) and Rule 801(2)(B), (C), and (D), as it purports to identify all privileged communications between Defendants and/or their representatives and counsel, and it may be used to impeach Defense witnesses.